

Mendiola, Doris

Subject: FW: Tim Zibell NAVFAC Engineering & Expeditionary Warfare Center (EXWC comments on Draft Regulatory Guide DG-5027; "General Use of Locks in Protection and Control of Facilities and Special Nuclear Materials, Classified Matter, and Safeguards Information..

Attachments: DoD_Lock_Program_NRC_Review.docx

1/2/2015
80 FR 53

-----Original Message-----

From: Zibell, Tim CIV EXWC, CI9 [mailto:tim.zibell@navy.mil]
Sent: Monday, February 23, 2015 5:01 PM
To: Tardiff, Al
Cc: Armstrong, Vaughan CIV EXWC, CI8; Ostrander, Cheryl CTR EXWC, CI8
Subject: Lock Regulatory Guide Review-U.S. Nuclear Regulatory Commission

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Al,

Attached are the compiled comments from the DOD Lock Program for the draft Regulatory Guide DG-5027. If you have any questions you can contact me directly or Mr. Vaughan Armstrong (805.982.1575).

R/ Tim

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NRC Document Review

Draft Regulatory Guide DG-5027 (December 2014)

	Page	Para.	Change
1	3	B.1	In addition, the guide contains updated references and relevant regulations where where identified. Reason: typo
2	5	1	Replace: Sentences two, three and four with: "If the combination of a lock is changed by an intruder, that person would have access, but an authorized user would not." Reason: Clarity.
3	5	2	The combinations of some key-change locks can be changed directly when the lock is in the open position, while others must have the existing combination reentered to a different index when the access is in the open position to permit the combination change. Reason: It isn't always to a different index; this detail isn't helpful to most readers
4	5	4	First sentence: replace "(Ref. 11)" with "(Ref. 12)" Reason: Ref. 12 is correct
5	5	4	Replace second and third sentences with: "To be approved by the General Services Administration (GSA), security containers and security vault doors and doors for facilities approved for open storage of classified information must be secured with a lock approved under Federal Specification FF-L-2740. The only exception is for field safes, safes specifically designed and built for protection of classified material under field conditions. These may use a lock meeting Underwriters Laboratories Inc. (UL) Standard 768, "Combination Locks," (Ref. 13), Group 1 or 1R. Currently, field safes are manufactured with locks meeting Federal Specification FF-L-2937." Reason: Original had errors and was awkwardly written; Ref. 13 is correct.
6	5	5	Replace second, third, and fourth sentences with: "Six locks have been approved under Federal Specification FF-L-2740: Mas-Hamilton Group models X-07 and X-08, Kaba Mas models X-09 and X-10, and Sargent and Greenleaf models 2740 and 2740B. All six models are electromechanical locks; the X-07, X-08, X-09, and X-10 are generator-powered, and the 2740 and 2740B are battery-powered. While all six models are approved, only the X-10 and 2740B are currently being produced." Reason: Original had errors and was not current.
7	6	Figure 2	Add photo of lock case Reason: There is more to the lock than the dial and dial ring.
8	6	1	First sentence: Replace "(Ref. 13)" with "(Ref. 14)" Reason: Ref. 14 is correct
9	6	1	Change: Pedestrian door locks meeting the requirements of Federal Specification FF-L-2890 that feature single-motion egress for life safety is are available and applicable for protection of facilities approved for open storage of classified information. Reason: Plural subject and verb
10	6	1	Replace: In last sentence "mated" with "integrated." Reason: correct word
11	6	2	Replace second sentence with: "Since April 20, 2007, all GSA-approved weapons containers and armory vault doors have been manufactured with a lock that meets Federal Specification FF-

	Page	Para.	Change
			L-2937, "Combination Lock, Mechanical" (Ref. 15). Reason: Correct information
12	6	3	Delete entire paragraph Reason: Repeats previous paragraph.
13	6	4	Replace: "(Ref. 15)" with "(Ref. 16)" and "(Ref. 16)" with (Ref. 17)" Reason: Correct references.
14	7	1	Replace: "A156.5-2001" with "A156.5-2014" Reason: Current edition.
15	7	1	Replace: "(Ref. 17)" with "(Ref. 18)" Reason: Ref. 18 is correct.
16	7	3	Delete: Second sentence Reason: Has no relevance to anything in the paragraph
17	7	3	Replace: Sentences three thru six with: "A six-pin cylinder with ten depths per pin theoretically provides one million different keys. Beyond basic pin-tumbler cylinders, several high-security lock cylinders are available. These can provide considerably increased resistance to covert and surreptitious attack, as well as increased key control." Reason: Original had errors and was awkward.
18	7	4	Replace: Second sentence with: "Master keying is the controlled loss of security, and so must be done correctly." Reason: Clarity
19	7	4	Replace: Sentence six with: "Furthermore, where locks are not routinely monitored (e.g., a padlock on a gate at a remote site), the lock should not be master keyed and the control key should be unique to that padlock." Reason: Correct information for any remote padlock.
20	7	5	Replace: Sentence one with: "Master keying is undesirable from a security point of view because any cylinder may be reverse-engineered to reveal the top master key." Reason: Clarity
21	7	5	Replace: Sentence three and four with: "In addition, any compromise of a master key compromises that entire master key system. Rekeying all the affected locks is costly, but the convenience of master key systems is such that there is strong pressure to use them." Reason: Clarity
22	7	6	Replace: Sentence one with: "It is essential for the bolt of a lock to be retained in the locked position by positive means, so that end pressure on the bolt will not retract it." Reason: Clarifies statement.
23	8	1	Replace: Sentence one "(Ref. 19)" with "(Ref. 20)" Reason: Ref. 20 is correct
24	8	1	Replace: Last sentence "(Ref. 20)" with "(Ref. 21)" Reason: Ref. 21 is correct.
25	8	2	Replace: Sentence two "(Ref. 21)" with "(Ref. 22)" Reason: Ref. 22 is correct.
26	8	2	Replace: Sentence two "(Ref. 21)" with "(Ref. 22)" Reason: Ref. 22 is correct.
27	8	3	Replace: Sentence three "(Ref. 23)" with "(Ref. 24)" Reason: Ref. 24 is correct.

	Page	Para.	Change
28	8	5	Replace: In sentence three: "The Navy designed ILD," with "The ILD," Reason: Redundant; first sentence already says Navy designed it
29	9	1	Replace: Fifth sentence -: "facilities" with "facilitates" Reason: Correct word
30	9	3	Replace Sentence three "It is released" with "The electric strike is released" Reason: Clarity
31	10	2	Replace: "(Ref. 24)" with "(Ref. 25)" and "(Ref. 25)" with "(Ref. 26)" Reason: Correct references.
32	10	5	Replace: "(Ref. 26)" with "(Ref. 27)" Reason: Ref. 27 is correct.
33	11	1 & 2	Replace: Paragraph one and two with: "For protection of classified information that is NOT subject to the Atomic Energy Act, replace 10 CFR 95 with information from 32 CFR 2001, effective 6/25/10, which applies to the NRC. See especially 2001.42 (a), <i>Storage</i> , and 2001.43, <i>Storage</i> ."
34	12	9	Replace: "(Ref. 27)" with "(Ref. 28)" Reason: Ref. 28 is correct.
35	14	5	Replace: "(Ref. 28)" with "(Ref. 29)" Reason: Ref. 29 is correct.
36	19	4	Replace: "(Ref. 30)" with "(Ref. 31)" Reason: Ref.31 is correct.
37	22	1	Replace: —"UL...Underwriters Laboratories, Inc. This for-profit nonprofit national testing laboratory..." Reason: They have been a for-profit lab since 2012.
38	23		References FOR ALL FEDERAL AND MILITARY SPECIFICATIONS: Refer to the " most current revision ," which includes amendments (if applicable). Refer to the DoD Lock Program website, http://www.navfac.navy.mil/go/locks , "Documents." FOR STANDARDS BY UNDERWRITERS LABORATORIES INC. and BUILDERS HARDWARE MANUFACTURERS ASSOCIATION: Refer to the " most current revision ." FOR STANDARDS BY THE AMERICAN SOCIETY FOR TESTING AND MATERIALS: Refer to the " most current revision ." FOR STANDARDS BY THE NATIONAL FIRE PROTECTION ASSOCIATION: Refer to the " most current revision ."
39	23	Footnote 3	Replace: Existing DoD Lock Program website URL with the URL stated above. Replace: Existing DoD Lock Program email address with _____
40	24	Reference 17:	Replace: Current text with: "National Archives and Records Administration, Information Security Oversight Office, 32 CFR Parts 2001 and 2003, RIN 3095-AB63, Implementing Directive No. 1, Classified National Security Information, Final Rule, June 25,

DoD Lock Program Review

	<i>Page</i>	<i>Para.</i>	<i>Change</i>
			2010."